EXECUTIVE SUMMARY - ENFORCEMENT MATTER Page 1 of 2

DOCKET NO.: 2007-0927-PWS-E **TCEQ ID:** RN101385029

CASE NO.: 33761

RESPONDENT NAME: City of Paducah

ORDER TYPE:		
X_1660 AGREED ORDER	FINDINGS AGREED ORDER	FINDINGS ORDER FOLLOWING SOAH HEARING
FINDINGS DEFAULT ORDER	_SHUTDOWN ORDER	IMMINENT AND SUBSTANTIAL ENDANGERMENT ORDER
_AMENDED ORDER	_EMERGENCY ORDER	
CASE TYPE:		
AIR	MULTI-MEDIA (check all that apply)	INDUSTRIAL AND HAZARDOUS WASTE
X PUBLIC WATER SUPPLY	PETROLEUM STORAGE TANKS	OCCUPATIONAL CERTIFICATION
WATER QUALITY	SEWAGE SLUDGE	UNDERGROUND INJECTION CONTROL
MUNICIPAL SOLID WASTE	RADIOACTIVE WASTE	DRY CLEANER REGISTRATION
TYPE OF OPERATION: Public water sup SMALL BUSINESS: YesX OTHER SIGNIFICANT MATTERS: The facility location. INTERESTED PARTIES: No one other the COMMENTS RECEIVED: The Texas Reg CONTACTS AND MAILING LIST: TCEQ Attorney/SEP Coordinator TCEQ Enforcement Coordinator Mr. Bryan Sinclair, Enforcement D	No re are no complaints. There is no record of additional and the ED and the Respondent has expressed an interister comment period expired on January 22, 2008. or: None :: Mr. Christopher Keffer, Enforcement Division, En	al pending enforcement actions regarding this rest in this matter. No comments were received. Inforcement Team 2, MC 169, (512) 239-5610;
	esented by counsel on this enforcement matter	

RESPONDENT NAME: City of Paducah DOCKET NO.: 2007-0927-PWS-E

VIOLATION SUMMARY CHART: CORRECTIVE ACTIONS VIOLATION INFORMATION PENALTY CONSIDERATIONS TAKEN/REQUIRED (1993) / Type of Investigation: Total Assessed: \$3,097 **Ordering Provisions:** Complaint X Routine The Order will require the Respondent to: Total Deferred: \$619 Enforcement Follow-up X Expedited Settlement a) Within 30 days after the effective date Records Review of this Agreed Order: Financial Inability to Pay Date(s) of Complaints Relating to this i. Compile and begin maintaining an up-Case: None SEP Conditional Offset: \$0 to-date and thorough plant operations manual for operator review and reference; Date of Investigation Relating to this Total Paid to General Revenue: \$2,478 Case: March 29, 2007 ii. Install backflow prevention devices at Site Compliance History Classification areas where a known health hazard exists; Date of NOV/NOE Relating to this Case: High ___ Average Poor May 29, 2007 (NOE) iii. Provide a flow meter on the well **Person Compliance History Classification** discharge lines; and Background Facts: This was a routine High X Average Poor investigation. iv. Acquire and submit the well Major Source: Yes X No completion data. WATER Applicable Penalty Policy: September 2002 b) With 60 days after the effective date of 1) Failure to submit well completion data this Agreed Order: prior to placing the well into service [30] TEX. ADMIN. CODE § 290.41(c)(3)(A)]. i. Submit documentation as described in Ordering Provision c. that demonstrates 2) Failure to perform customer service compliance with Ordering Provision a.; inspections prior to providing continuous water service to new construction [30 Tex. ii. Implement a customer service ADMIN. CODE § 290.46(j)]. inspection program that will ensure that customer service inspections are 3) Failure to install a backflow prevention performed by a certified individual; and assembly within the distribution system where a known health hazard exists [30 iii. Ensure the ground storage tanks are TEX. ADMIN. CODE § 290.44(h)(4)]. maintained and designed in strict accordance with current AWWA 4) Failure to provide flow meters on the standards. well discharge lines [30 Tex. ADMIN. CODE § 290.41(c)(3)(N)]. c) Within 75 days after the effective date of this Agreed Order, submit written 5) Failure to compile a thorough plant certification and include detailed operations manual and keep it up-to-date supporting documentation including for operator review and reference [30 Tex. photographs, receipts, and/or other records ADMIN. CODE § 290.42(I)]. to demonstrate compliance with Ordering Provision b. 6) Failure to maintain, design, fabricate, erect, test and disinfect all facilities for potable water storage in strict accordance with American Water Works Association ("AWWA") standards [30 Tex. ADMIN. CODE § 290.43(c)(2), (3), (6) and (8)].

	•	Calculatio	n Works	heet (P	•	
Policy Revision 2 (Sept	ember 2002)				PCW Revisi	on May 25, 2007
DATES Assigned	4-Jun-2007				aran kanan kana	
DATES Assigned PCW		g 11-Jun-2007.	EPA Due			
RESPONDENT/FACILITY	INFORMATION		# / . W 			
Respondent	City of Paducah					
Reg. Ent. Ref. No.	RN101385029				IN AS 22 2 2	
Facility/Site Region	3-Abilene		j Major/i	Minor Source	IMINOr	
CASE INFORMATION			· · · · · · · · · · · · · · · · · · ·			
Enf./Case ID No.	33761		No.	of Violations	6	
Docket No.	2007-0927-PWS-E]	Order Type		
	Public Water Supply		Enf.	Coordinator		
Multi-Media	_imit Minimum \$50	Maximum	\$1,000	EC's Team	EnforcementTeam 2	
Admin. Penalty \$	_imit minimum[\$50	Maximum	\$1,000	··········		
	Pon	alty Calcula	ation Sec	tion		
				LIOTI	aan oo oo kaa	
TOTAL BASE PENAL	.TY (Sum of violation	i base penaltic	es)		Subtotal 1	\$2,950
ADJUSTMENTS (+/-)	TO SUBTOTAL 1 ned by multiplying the Total Base	Donalty (Subtotal 1) by	wtho indicated non	centage		
Compliance Hist	 The state of the s	and the second of the second of the second of	Enhancement		otals 2, 3, & 7	\$147
Comphaneo	Enhancement due to o					
Notes	violations the same					
	Violations the same t		Tone omoroom			
Culpability	No	0%	Enhancement		Subtotal 4	\$0
		· I · · · · · · · · · · · · · · · · · ·			a control en 1910 soci de	
Notes	The Respondent	does not meet th	e culpability cr	iteria.		***************************************
					J	
Good Faith Effor	t to Comply	0%	Reduction	tyr en ge	Subtotal 5	\$0
		PRP/Settlement Offer				
Extraordinary						000000000000000000000000000000000000000
Ordinary N/A	X (mark with x					ON THE PROPERTY OF THE PROPERT
	1				1	Japan da
Notes	The Respondent	does not meet th	e good faith cr	iteria.		
			Enhancement*		Subtotal 6	\$0
Approx.	Total EB Amounts \$908 Cost of Compliance \$18,900	*Cappe	d at the Total EB \$	S Amount		www.docate
7 447.57	ψ10,000					
SUM OF SUBTOTAL	S 1-7			1	Final Subtotal	\$3,097
	S JUSTICE MAY REC				Adjustment	\$0
Reduces or enhances the Final S	Subtotal by the indicated percenta	ge. (Enter number on	ly; e.g30 for -30	%.)	7	***************************************
Netes					'	00000000000000000000000000000000000000
Notes						40000000
				Final Pe	nalty Amount	\$3,097
a to the same of t						
STATUTORY LIMIT	ADJUSTMENT			Final Asse	essed Penalty	\$3,097
DEFERRAL	•		20%	Reduction	Adjustment	-\$619
Reduces the Final Assessed Pe	nalty by the indicted percentage.	(Enter number only; e.	.g. 20 for 20% red	uction.)		
B1_4	Deformal	ffored for avadite	ad sattlamant			
Notes	Delerral C	ffered for expedite	sa semement.			
					_	normanovo-va-
PAYABLE PENALTY	•					\$2,478

Screening Date 11-Jun-2007

Docket No. 2007-0927-PWS-E

PCW

Respondent City of Paducah

Case ID No. 33761

Policy Revision 2 (September 2002) PCW Revision May 25, 2007

Reg. Ent. Reference No. RN101385029

Media [Statute] Public Water Supply

Enf. Coordinator Amy Martin

Notes	i sa i salaya gagas ya Turkiya tayasi. G		
Compliance History	Enhancement due to one previous Notice of Violation ("NOV") with violations the same as current enforcement case.	those in the	Andrews (1997)
liance History	Summary	No presultant i jak	radioni i
Average Po	erformer Adjustment Po	ercentage (Sı	ıbtotal 7)
oliance History	Person Classification (Subtotal 7)		
N/A	Adjustment Po	ercentage (St	ıbtotal 3)
at Violator (Su	btotal 3)		
	Adjustment Po		-
	environmental requirements	No	0%
le management and	Participation in a voluntary pollution reduction program Early compliance with, or offer of a product that meets future state or federal government		
Other	special assistance program Perticipation in a valuatory pollution reduction program	No	0%
	Voluntary on-site compliance assessments conducted by the executive director under a	No	0%
	Environmental management systems in place for one year or more	No No	0%
		e Enter Yes or No	
Zudita	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which violations were disclosed)	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were submitted)	0	0%
Emissions	Chronic excessive emissions events (number of events)	0	0%
Convictions	Any criminal convictions of this state or the federal government (number of counts)	0	0%
and Consent Decrees	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	en de la company de la comp La company de la company d	0%
Judgments	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (number of judgements or consent decrees meeting criteria)	0	0%
Orders	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	• • • • • • • • • • • • • • • • • • •	0%
	Any agreed final enforcement orders containing a denial of liability (number of orders meeting criteria)		0%
F 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	Other written NOVs	laWis0.sd	0%
NOVs	Written NOVs with same or similar violations as those in the current enforcement action (number of NOVs meeting criteria)	delevente New Delevent	5%

Screening Date	11-Jun-2007	Docket No. 2007-0927-PWS-E	PCW
Respondent	City of Paducah		Policy Revision 2 (September 2002)
Case ID No.	33761		PCW Revision May 25, 2007
Reg. Ent. Reference No.			
	Public Water Supply	y	*
Enf. Coordinator			
Violation Number	1	t and the second se	· .
Rule Cite(s)		30 Tex. Admin. Code § 290.41(c)(3)(A)	of the control of the
Violation Description		rell completion data prior to placing a well into service. Specif etion data was submitted for any of the 12 production wells.	fically,
		Base F	Penalty \$1,000
>> Environmental, Property :	and Human Heal	th Matrix	III JADAN AND AND AND AND AND AND AND AND AND
Release		arm derate Minor	YEROOOKOO HARIA
OR Actua		derate willion	
Potentia	L	Percent 0%	venaconomore de la companya della companya della companya de la companya della co
CONTROL OF THE STATE OF THE STA		製料性開発機能を開発していてもながったときできる。 ・ 1000年 -	Audio et allino 1000
>>Programmatic Matrix	Major Major	donto Minor	· ·
Falsification	Major Moo	derate Minor Percent 10%	y y y y y y y y y y y y y y y y y y y
	JL^	10/0	WIAA00000000000000000000000000000000000
Matrix Notes .	100	% of the rule requirement was not met.	
		Adjustment	\$900
	•		\$100
		•	Ψ100
Violation Events			
Number of Vi	olation Events	12 Number of violation days	· · · · · · · · · · · · · · · · · · ·
•	1		· ·
	daily		
mark only one with an x	monthly quarterly semiannual annual single event	Violation Base I	Penalty \$1,200
 			
	Twelve sing	le events (one for each well) are recommended.	
Economic Benefit (EB) for the	nis violation	Statutory Limit Test	
Estimate	ed EB Amount	\$419 Violation Final Penal	ty Total \$1,260
	leaseneous contraction of the co	This signal Annual Described a few	(1 260) £1 260
		This violation Final Assessed Penalty (adjusted for	r limits) \$1,260

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Respondent	City of Paducah	edisavan eren i i i i i i i i i i i i i i i i i i i				generalista eta eta eta eta eta eta eta eta eta e	
Case ID No.							
		•					
Reg. Ent. Reference No.					1 1 1	P	Years of
	Public Water Si	upply				Percent Interest	
Violation No.	1						Depreciation
- all constitution of						5.0	18
processor describerations	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description	. Ne sammas as Φ	· · · · · · · · · · · · · · · · · · ·				Penning salah	
item Description	i No commas or \$	Carta Cilicada	okalabovatorii			T. Merines and Section 1	
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Delayed Costs		1		11 00	T 60	1 60 1	<u>Ф</u> О
Equipment				0.0	\$0 \$0	\$0 \$0	\$0 \$0
Buildings				0.0	\$0	\$0	
Other (as needed)		4-4	nisket ang mai tuli.	0.0	\$0	\$0	\$0 \$0
Engineering/construction Land	<u> </u>		د مواجع ال <u>يام الموافع المام الم</u>	0.0	\$0	n/a	\$0 \$0
Record Keeping System				0.0	\$0	n/a	\$0
Training/Sampling				0.0	\$0	n/a	\$0
Remediation/Disposal				0.0	\$0	n/a	\$0
Permit Costs		The second second	<u> </u>	0.0	\$0	n/a	\$0
Other (as needed)	\$9,000	29-Mar-2007	3-Mar-2008	0.9	\$419	n/a	\$419
, ,			10 (10) 41 (10)	l illian	ti en nomen de la com		ea hay ce dae af
Notes for DELAYED costs	Estimated co	ost to prepare and s	submit the well co Final date is the e	mpletion stimated	data. Date required date of compliant	ed is the date of the ce.	investigation.
Notes for DELAYED costs Avoided Costs	Estimated co	ost to prepare and s	submit the well co Final date is the e	mpletion stimated entering	data. Date required date of compliance item (except for	ed is the date of the ce. one-time avoided c	investigation.
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Avoided Costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)	Estimated co	UALIZE [1] avoid	submit the well co Final date is the e	mpletion stimated 0.0	data. Date required date of compliance item (except for \$0\$0\$0\$0\$0\$0\$0\$0.	ed is the date of the ce. one-time avoided c \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	osts) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
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Scree	ning Date	11-Jun-2007		***************************************	Docket N	Vo. 2007-0927	7-PWS-E		PCW
Re	spondent	City of Paduca	ah .					Policy Re	vision 2 (September 2002)
	ase ID No.							· Pi	CW Revision May 25, 2007
Reg. Ent. Refe									
Media	a [Statute]	Public Water	Supply						
	oordinator	Amy Martin							
	tion Number	2							
	Rule Cite(s)			30 Tex. Adm	in. Code §	290.46(j)			
Violation	Description			on. Specifical		prior to providi er system failed spector.			•
							Bas	se Penalty	\$1,000
>> Environmental,	Property a	nd Human	Health Ma	trix					
Application of the second seco			Harm						-
OR	Release Actual	Major	Moderate	Minor	7				
	Potential		X		j	Percent	10%		
		gyrog ag legger gyarray a gyrog	w neigh hereby sent	. 180.2000 - 200.200.0000.0000.000		PET 1783			
>>Programmatic N					Stories II. A	100		*	
and the second second	Falsification	Major	Moderate	Minor	╗	Davaant	00/	Ī	****
Superior Africa					ᆁ	Percent	. 0%		Annual services
Matrix Notes						he water supply tective of huma		nt amounts	
DESIGNATION OF THE PROPERTY OF	#HOSE MODEL	Edition of the Co		ar King and when the		Adjustmen	t	\$900	
1100/1631628/358/23/23/23/23/23/23/23/23/23/23/23/23/23/		THE SHEET THE PERSON AND THE PERSON	ko A Berts Seedorii e. Li		ESSENCE TO YOUR RESIDENCE		<u></u>		
		•						٠.	\$100
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	Number of Vic	lation Events	1		74	Number o	of violation da	ays	
				===	1				
		daily							
		monthly		4			/iolotion Pa	co Bonalty	\$100
	mark only one with an x	quarterly semiannual	X	1		,	/iolation Ba	ise Penaity	Ψ100
	Trace Care A	annual		1					
		single event		1					
	i		<u> </u>	븨					
	One quarterly	event is reco	mmended fro	om the March screening		nvestigation da	te to the Jur	ne 11, 2007	
Economic Benefit	(EB) for th	is violation				Statuto	ry Limit T	est	
	Fetimater	d EB Amount		\$2	5]	Violat	ion Final Pe	enalty Total	\$105
	_simatet	a Ew Allioulit	L					•	
	(100 to 100 to	mpama analy a masamang		This violation	n Final As	ssessed Pena	lty (adjusted	d for limits)	\$105
Lagrance and Control of the Control						1. 主题等 一致的对对例如			attraces of a second district [

* 1	City of Paducal	า			74 J. V. 19 A		
Case ID No.							
Reg. Ent. Reference No.							
Media	Public Water S	upply				Percent Interest	Years of
Violation No.	2						Depreciation
					S TRANSPORT	5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
그 그 얼마나가 그리 함께서	The Administration of the Control of			113	IIIIGI GSI Javeu	Officiallie Costs	LD Allount
Item Description	No commas or \$	Association programmed of	010411.1				
and the second of the second of			CONTRACTOR SERVICE SERVICES CO				
Delayed Costs	اللاول المسهود لاوران		للمالي والمتعادلات والتنا	<u>Ega-ba</u>			
Equipment	diana malausia		ating a law that only	0.0	\$0	\$0	\$0
Buildings			<u> Pagasan da ar</u>	0,0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0
Engineering/construction				0.0	\$0	\$0	\$0
Land				0,0	\$0	n/a	\$0
Record Keeping System	11 11 11 11 11 11	e in characherthau chai	Taken a second	0,0	\$0	n/a	\$0
Training/Sampling				0.0	\$0	n/a	\$0
Remediation/Disposal				0.0	\$0	n/a	\$0
					I. @n		
Permit Costs				0.0	\$0	n/a	\$0
Other (as needed)	\$500 Estimated co	29-Mar-2007 ost to complete the	3-Apr-2008	1.0 er service	\$25 inspector training	n/a . Date required is the	· \$25
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal	Estimated co	ost to complete the investig	required custome ation. Final date	1.0 er service is the es entering	\$25 inspector training timated date of co item (except for	n/a Date required is the mpliance. Done-time avoided c	se date of the osts)
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel	Estimated co	ost to complete the investig	required custome ation. Final date	1.0 er service is the es entering 0.0 0.0	\$25 inspector training timated date of co item (except for \$0 \$0 \$0	n/a Date required is the mpliance. Done-time avoided composition in the second secon	se date of the osts)
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling	Estimated co	ost to complete the investig	required custome ation. Final date	1.0 er service is the es entering 0.0 0.0	\$25 inspector training timated date of co item (except for \$0 \$0 \$0	n/a Date required is the impliance. one-time avoided c \$0 \$0 \$0	\$25 ne date of the osts) \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment	Estimated co	ost to complete the investig	required custome ation. Final date	1.0 er service is the es entering 0.0 0.0 0.0 0.0	\$25 inspector training timated date of co item (except for \$0 \$0 \$0 \$0 \$0	n/a Date required is the mpliance. one-time avoided c \$0 \$0 \$0 \$0	• \$25 ne date of the osts) \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]	Estimated co	ost to complete the investig	required custome ation. Final date	1.0 er service is the es entering 0.0 0.0 0.0 0.0	\$25 inspector training timated date of co item (except for \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a n Date required is the mpliance. ne-time avoided c \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$25 se date of the osts) \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	Estimated co	ost to complete the investig	required custome ation. Final date	1.0 er service is the es entering 0.0 0.0 0.0 0.0 0.0 0.0	\$25 inspector training timated date of co item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a Date required is the mpliance. ne-time avoided compliance so	\$25 te date of the solution \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]	Estimated co	ost to complete the investig	required custome ation. Final date	1.0 er service is the es entering 0.0 0.0 0.0 0.0	\$25 inspector training timated date of co item (except for \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a n Date required is the mpliance. ne-time avoided c \$0 \$0 \$0 \$0 \$0 \$0 \$0	• \$25 ne date of the osts) \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	Estimated co	ost to complete the investig	required custome ation. Final date ad costs before e	1.0 r services the es	\$25 inspector training timated date of co item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a Date required is the mpliance. one-time avoided c \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$25 te date of the solution \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

Screening Date	11-Jun-2007	Docket No.	2007-0927-PWS-E	PCW
Respondent	City of Paducah		Policy Re	vision 2 (September 2002)
Case ID No.	33761		P	CW Revision May 25, 2007
Reg. Ent. Reference No.	RN101385029			
Media [Statute]	Public Water Supply	•		
Enf. Coordinator	Amy Martin	,		
Violation Number				
Rule Cite(s)		30 Tex. Admin. Code § 290.4	4(b)(4)	
Violation Description		kflow prevention assembly withir exists. Specifically, the Paducal with a backflow prevention o	the distribution system where an High School was not equipped	
>> Environmental, Property a	and Human Health	Matrix	Base Penalty	\$1,000
	Harn	1 ·	uspanouss, est o fuellich schernbullichtstätigen H	
Release		ate Minor		
OR Actual	<u> </u>		B	
Potential	L X		Percent 25%	
>>Programmatic Matrix				
Falsification	Major Modera	ate Minor		
Taisincation	Wajor Woden		Percent 0%	
	<u> </u>			
Matrix Notes Failure to in	stall backflow preventio enter the system whi	ch would exceed levels protective	icant amount of contaminants to e of human health.	0
forest superior (1971) in a superior (1986) fill fill for the was that I in America are shared a last training	ini sirokole kiji dipelok ketalih daleh bila sisi saksi sa	energen er bestricke film mit die er in 1994 blie 1970 en fan it die mit 1972 beken 1974 blie 1974 blie 1974 b Die sterne die sterne die sterne die sterne die 1974 blie 1974 blie 1974 blie 1974 blie 1974 blie 1974 blie 1	19,000,000	
			•	\$250
Violation Events		. 74	Number of violation days	
Number of Vi	daily x	74		
mark only one with an x	quarterly semiannual annual single event		Violation Base Penalty	\$750
Three mont	hly events are recomm	ended from the March 29, 2007 i 2007 screening date.	nvestigation date to the June 11,	
Economic Benefit (EB) for th	THE STATE OF THE S		Statutory Limit Test	
Estimate	d EB Amount	\$9	Violation Final Penalty Total	\$787
		This violation Final Acces	sed Penalty (adjusted for limits)	\$787
		This violation Final Asses	seu renaity (aujusteu ior illilits)	<u> </u>

		conomic l	3enefit W	orks	heet	li 600 (11 di 10)	P 343
Respondent	City of Paducal	Company of the second s				1 86 (S.A. 1964) 1 (S.A. 1964)	
Case ID No.	33761				5.	or this literary	
Reg. Ent. Reference No.	RN101385029					Salt Barbines 1. S	The Francis
그 그 그 그 그 그 그 그 그 그 그 그 그 그 그 그 그 그 그	Public Water S	vlaqu				Access to the second	Years of
Violation No.						Percent Interest	Depreciation
					a composition that	5.0	15
		Service Introductions of the	-, 1, 2, 3, 1				garaga kagana ana ana ana ana ana ana ana ana an
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description	No commas or \$	Application of the second					
	• .						
Delayed Costs	and the first of the second				To the second se		
Equipment			M Makabi Harsa G.	0.0	\$0	\$0	\$0
Buildings				0,0	\$0	\$0	\$0
Other (as needed)		Yangir sanggan		0.0	\$0	\$0	\$0
Engineering/construction				0.0	\$0	\$0	\$0
Land				0.0	\$0	n/a	\$0
Record Keeping System	Assessment of the second		<u>Lange di Ling</u>	0,0	\$0	n/a	\$0
Training/Sampling				0.0	\$0	n/a	\$0
Remediation/Disposal				0.0	\$0	n/a	\$0
						,	
Permit Costs				0,0	\$0	n/a	\$0
Permit Costs Other (as needed)	\$200	29-Mar-2007	3-Mar-2008	0.9	\$9	n/a	\$9.
Other (as needed) Notes for DELAYED costs	Estimated cos	t to install the backf	low prevention de is the estima	0.9 vice. Da ted date	\$9 te required is the of compliance.	n/a date of the investiga	\$9 ation. Final date
Other (as needed) Notes for DELAYED costs Avoided Costs	Estimated cos	t to install the backf	low prevention de is the estima	0.9 vice. Da ted date	\$9 te required is the of compliance.	n/a date of the investiga	\$9 ation. Final date
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal	Estimated cos	t to install the backf	low prevention de is the estima	vice. Dated date	\$9 te required is the of compliance. item (except for a \$0	n/a date of the investigation	\$9 ation. Final date
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel	Estimated cos	t to install the backf	low prevention de is the estima	0.9 vice. Da ted date	\$9 te required is the of compliance. item (except for a \$0 \$0	n/a date of the investiga	\$9 ation. Final date
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling	Estimated cos	t to install the backf	low prevention de is the estima	vice. Dated date	\$9 te required is the of compliance. item (except for a \$0	n/a date of the investigation avoided constitution \$0 \$0	\$9 ation. Final date costs) \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel	Estimated cos	t to install the backf	low prevention de is the estima	vice. Dated date ntering 0.0 0.0 0.0	te required is the of compliance. item (except for a \$0 \$0 \$0 \$0	n/a date of the investigation cone-time avoided of \$0 \$0 \$0 \$0	\$9 ation. Final date costs) \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment	Estimated cos	t to install the backf	low prevention de is the estima	0.9 vice. Dated date ntering 0.0 0.0 0.0 0.0	te required is the of compliance. item (except for a \$0 \$0 \$0 \$0 \$0	n/a date of the investige	\$9 ation. Final date sosts) \$0 \$0,, \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]	Estimated cos	t to install the backf	low prevention de is the estima	0.9 vice. Dated date ntering 0.0 0.0 0.0 0.0 0.0	te required is the of compliance. item (except for a \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a date of the investigation	\$9 ation. Final date sosts) \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	Estimated cos	t to install the backf	low prevention de is the estima	vice. Dated date ntering 0.0 0.0 0.0 0.0 0.0 0.0 0.0	te required is the of compliance. item (except for or \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a date of the investigation	\$9 ation. Final date costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)	Estimated cos	t to install the backf	low prevention de is the estima ed costs before e	0.9 vice. Dated date ntering 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0	te required is the of compliance. item (except for or \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a date of the investige cone-time avoided of \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$9 ation. Final date costs) \$0 \$0,
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	Estimated cos	t to install the backf	low prevention de is the estima ed costs before e	0.9 vice. Dated date ntering 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0	te required is the of compliance. item (except for except for exc	n/a date of the investige cone-time avoided of \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$9 ation. Final date costs) \$0 \$0,
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)	Estimated cos	t to install the backf	low prevention de is the estima ed costs before e	0.9 vice. Dated date ntering 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0	te required is the of compliance. item (except for or \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a date of the investige cone-time avoided of \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$9 ation. Final date costs) \$0 \$0,
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)	Estimated cos	t to install the backf	low prevention de is the estima ed costs before e	0.9 vice. Dated date ntering 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0	te required is the of compliance. item (except for or \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a date of the investige cone-time avoided of \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$9. ation. Final date costs) \$0 \$0,
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)	Estimated cos	t to install the backf	low prevention de is the estima ed costs before e	0.9 vice: Dated date ntering 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0	te required is the of compliance. item (except for or \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a date of the investige cone-time avoided of \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$9. ation. Final date costs) \$0 \$0,

Screenin	g Date 11-Jun-2007	Docke	t No. 2007-0927-PWS-E	PCW
Respo	ondent City of Paducah		Policy Re	evision 2 (September 2002)
	ID No. 33761		P	CW Revision May 25, 2007
_	ice No. RN101385029			
	tatute] Public Water Suppl	y		
	dinator Amy Martin			APPARENT AND
Violation				
Kui	e Cite(s)	30 Tex. Admin. Code §	290.41(c)(3)(N)	
Violation Des		flow meters on the well dischauction wells were equipped w	arge lines. Specifically, none of the 12 vith individual flow meters.	
			Base Penalty	\$1,000
>> Environmental, Pro	perty and Human Heal			
		arm derate Minor		
OR	Actual	Terate Millor		
DS: J. 3:55 SARVA.	Potential	x	Percent 5%	-
			· 汽车,将基础	
>>Programmatic Matr		derate Minor		
	sification Major Mo		Percent 0%	
Patricine de cons			<u> </u>	
			ate water supply because the operator s to ensure a continuous and safe water	
and Companies and State of the	and a street of the near the	re combacilia de la company	Adjustment \$950	. !
				\$50
				1 400
Violation Events	ring in trade in the second	an ang pagpad kacabi tang at pagpagan sa pag-		
			No alternative desire	
Num	ber of Violation Events	12 7	Number of violation days	
	daily			•
	monthly			
	k only one quarterly		Violation Base Penalty	\$600
И	ith an x semiannual			
	annual single event	x		
	Jingle Cvent			
	Twelve sing	gle events (one for each well)	are recommended.	
Economic Benefit (El	3) for this violation		Statutory Limit Test	
	Estimated EB Amount	\$140	Violation Final Penalty Total	\$630
•				
		This violation Final	Assessed Penalty (adjusted for limits)	\$630

Media	RN101385029 Public Water S	upply				Percent Interest	Years of
Violation No.	4	The state of the s				er iztanajus justika	Depreciation
						5.0	1
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description	No commas or \$						
Delayed Costs			u storican				
Equipment	and the second second			0.0	\$0 \$0	\$0 \$0	\$0 \$0
Buildings (Other (on needed)	is , till is a bijinilik kan	alifika iku		0.0	\$0 \$0	\$0 \$0	\$0 \$0
Other (as needed) Engineering/construction	123401 (1244)	Aller on the second		0.0	\$0	\$0 \$0	\$0 \$0
Land				0.0	\$0	n/a	\$0
Record Keeping System		100000000000000000000000000000000000000		0.0	\$0	n/a	\$0
Training/Sampling				0.0	\$0	n/a	\$0
Remediation/Disposal				0.0	\$0	n/a	\$0
Permit Costs				0.0		¹ n/a	
·	\$3,000 Estimated cost	29-Mar-2007 to install a flow me		0.0 0.9 12 wells	\$0 \$140 . Date required is		\$0 . \$140
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs	Estimated cost	to install a flow me	eter on each of the date is the esti	0.0 0.9 12 wells nated da	\$0 \$140 5. Date required in the of compliance. item (except for	n/a n/a s the date of the inve	\$0 \$140 estigation. Fina
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal	Estimated cost	to install a flow me	eter on each of the date is the esti	0.0 0.9 12 wells mated da entering	\$0 \$140 s. Date required is to of compliance. item (except for \$0	n/a n/a s the date of the inve	\$0 \$140 estigation. Fina
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel	Estimated cost	to install a flow me	eter on each of the date is the esti	0.0 0.9 12 wells mated da entering 0.0 0.0	\$0 \$140 5. Date required is the of compliance. item (except for \$0 \$0	s the date of the investigation one-time avoided of \$0	\$0 \$140 estigation. Fina costs) \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling	Estimated cost	to install a flow me	eter on each of the date is the esti	0.0 0.9 12 wells nated da entering 0.0 0.0	\$0 \$140 S. Date required is the of compliance. item (except for \$0 \$0 \$0	s the date of the investigation one-time avoided constraints on \$0 \$0 \$0 \$0	\$0 \$140 estigation. Fina costs) \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment	Estimated cost	to install a flow me	eter on each of the date is the esti	0.0 0.9 12 wells nated da entering 0.0 0.0 0.0	\$0 \$140 5. Date required is the of compliance. item (except for \$0 \$0 \$0 \$0	s the date of the inve	\$0 \$140 estigation. Fina sosts) \$0 \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs AVOIDED COSTS Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]	Estimated cost	to install a flow me	eter on each of the date is the esti	0.0 0.9 0.9 0.0 0.0 0.0 0.0 0.0 0.0	\$0 \$140 \$. Date required is the of compliance. item (except for \$0 \$0 \$0 \$0 \$0	s the date of the inve	\$0 \$140 estigation. Fina sosts) \$0 \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs AVOIDED COSTS Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	Estimated cost	to install a flow me	eter on each of the date is the esti	0.0 0.9 12 wells nated da entering 0.0 0.0 0.0 0.0 0.0	\$0 \$140 \$. Date required is the of compliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0	one-time avoided or \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$	\$0 \$140 estigation. Fina sosts) \$0 \$0 \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs AVOIDED COSTS Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]	Estimated cost	to install a flow me	eter on each of the date is the esti	0.0 0.9 0.9 0.0 0.0 0.0 0.0 0.0 0.0	\$0 \$140 \$. Date required is the of compliance. item (except for \$0 \$0 \$0 \$0 \$0	s the date of the inve	\$0 \$140 estigation. Fina sosts) \$0 \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	Estimated cost	UALIZE [1] avoide	eter on each of the date is the esti ed costs before e	0.0 0.9 0.2 wells nated da entering 0.0 0.0 0.0 0.0 0.0 0.0	\$0 \$140 \$. Date required is the of compliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0	s the date of the inverse state of the inverse stat	\$0 \$140 estigation. Fina sosts) \$0 \$0 \$0 \$0 \$0

Screening Date	11-Jun-2007	Docket N	o. 2007-0927-PWS-E	PCW
	City of Paducah		Policy	Revision 2 (September 2002)
Case ID No.				PCW Revision May 25, 2007
Reg. Ent. Reference No.				
Media [Statute]	Public Water Supply			-
Enf. Coordinator	Amy Martin			
Violation Number	5			
Rule Cite(s)		30 Tex. Admin. Code § 2	290.42(1)	
		3		
Violation Description	Failed to compile a thorc	ugh plant operations manua review and referen	al and keep it up-to-date for operat ce.	or
			Base Penal	ty \$1,000
>> Environmental, Property a	and Human Health M	atrix		
	Harm	, 1 <i>1</i> 2		
Release OR Actual	······	e Minor		
Potential			Percent 0%	
Totelida	<u>L</u>		1 61 66 N	
>>Programmatic Matrix			(47) 資金	
Falsification	Major Moderate	<u>Minor</u>		
	X		Percent 10%	
Matrix Notes	100% of	the rule requirement was no	ot met.	
The state of the s	magnification value of the first last of the state of		Adjustment \$9	00
	PERFERENSIA DELA CALBANAL DA COL	.1 11.2. 12. 12. 12. 12. 12. 12. 12. 1	22559 (24 € 532746 132 #3193)	
-	•			\$100
	in the second se	and decin literal and in the second district of the	erinkan kerkeraran kanarak perkeri tangan manarak kerkeran m	process.
Violation Events	interstruteur disease a beide da. 2		CONTRACTOR SERVICES TO SERVICE AND ADMINISTRATION OF THE SERVICES.	NA I
Number of Vi	olation Events 1	74	Number of violation days	
Trainbor or tr	old for Evolve			
	daily			
· ·	monthly			
mark only one	quarterly		Violation Base Pena	ty \$100
with an x	semiannual			
	annual			
	single event x			
			,	
	One	single event is recommend	ed.	
Economic Benefit (EB) for th	nis violation		Statutory Limit Test	
, F-414	d ED Amount	<u>¢0</u>]	Violation Final Penalty To	tal \$105
Estimate	d EB Amount	\$9	violation final Femalty 10	ψ100
		This violation Final Ass	essed Penalty (adjusted for limi	ts) \$105

Reg. Ent. Reference No.	City of Paducal 33761 RN101385029	h				, 新聞養之數數為達,可如如此有十5次。	
	Public Water S	upply			* * * * * * * * * * * * * * * * * * * *	Percent Interest	Years of Depreciation
	AND PRODUCTION OF A 1991	State Comment States	种化、基料。			5,0	18
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description			pionto :				
Delayed Costs	1,100	Mariani, ka sa		T 0.0	J \$0	\$0	\$0
Equipment Bulldings	For a district to		a an	0.0	\$0 \$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	***** \$ 0
Engineering/construction				0.0	\$0	\$0	\$0
Land				0.0	\$0	n/a	\$0
Record Keeping System				0.0	\$0	n/a	\$0
Training/Sampling			File Comment	0.0	\$0	n/a	\$0
Remediation/Disposal			a la alamana	0.0	\$0	n/a	\$0
Permit Costs	100			0,0	\$0	n/a	\$0
	The state of the s						
Other (as needed)	\$200 Estimated cos	29-Mar-2007	3-Mar-2008 aintain a plant ope	0.9 erations r	\$9 manual. Date requ	n/a uired is the date of th	\$9 ne investigation.
Notes for DELAYED costs	Estimated cos	at to compile and ma	aintain a plant ope Final date is the e	erations r estimated	manual. Date requ date of compliance	ired is the date of th	ne investigation.
Notes for DELAYED costs Avoided Costs	Estimated cos	at to compile and ma	aintain a plant ope Final date is the e	erations r estimated	manual. Date requ date of compliance	uired is the date of the	ne investigation.
Notes for DELAYED costs	Estimated cos	at to compile and ma	aintain a plant ope Final date is the e	erations r estimated entering	nanual. Date required to the compliance of compliance item (except for	uired is the date of the control of	ne investigation.
Notes for DELAYED costs Avoided Costs Disposal	Estimated cos	at to compile and ma	aintain a plant ope Final date is the e	erations restimated	manual. Date required date of compliance item (except for \$0 \$0 \$0	uired is the date of the ce	ne investigation.
Notes for DELAYED costs Avoided Cost's Disposal Personnel	Estimated cos	at to compile and ma	aintain a plant ope Final date is the e	entering 0.0 0.0 0.0 0.0	manual. Date required tem (except for \$0 \$0 \$0 \$0	uired is the date of the control of	ne investigation. Sosts) \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling	Estimated cos	at to compile and ma	aintain a plant ope Final date is the e	entering 0.0 0.0 0.0 0.0 0.0 0.0	manual. Date required to the compliance of compliance of the compl	one-time avoided of \$0 \$0 \$0 \$0 \$0 \$0	costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment	Estimated cos	at to compile and ma	aintain a plant ope Final date is the e	entering 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0	manual. Date required to the compliance of compliance item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	vired is the date of the ce. one-time avoided of \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	sosts) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]	Estimated cos	at to compile and ma	aintain a plant ope Final date is the e	entering 0.0 0.0 0.0 0.0 0.0 0.0	manual. Date required to the compliance of compliance of the compl	one-time avoided of \$0 \$0 \$0 \$0 \$0 \$0	costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Suppiles/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	Estimated cos	NUALIZE [1] avoide	aintain a plant ope Final date is the e	entering 0.0 0	manual. Date required tem (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	one-time avoided of \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$	sosts) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

Screening Date	11-Jun-2007	Docket No	2007-0927-PWS-E	PCW
Respondent	City of Paducah		Policy Re	evision 2 (September 2002)
Case ID No.	33761		P	CW Revision May 25, 2007
Reg. Ent. Reference No.	RN101385029			
Media [Statute]	Public Water Supply			
Enf. Coordinator				
Violation Number	6			
Rule Cite(s)	30 Tex	c. Admin. Code § 290.43(c)(2), (3), (6) and (8)	
Violation Description	water storage in strict a standards. Specifically equipped with a 30" acc gallon GST was not equ	ccordance with American Wa , the 0.150 million gallon gro ess opening and the paint wa	d disinfect all facilities for potable ater Works Association ("AWWA") and storage tank ("GST") was not as deteriorating. The 0.250 millioning, had deteriorated sand trapsing in two areas.	
			Base Penalty	\$1,000
>> Environmental, Property a	and Human Health M	atrix .		
11281-064	Harm	G	Menter de la company de la	
Release	Major Moderate	<u>Minor</u>		
OR Actual				•
Potential	<u> </u>		Percent 10%	
	123512 Control to the control of the	Complete Com	108	
>>Programmatic Matrix Falsification	Major Moderate	e Minor		
Faisincation	Major Moderate		Percent 0%	
Language Section				
	stomers of the water supp		ance with AWWA standards could collutants which would not exceed a could not exceed. Adjustment \$900	
				\$100
				Ψ100
Violation Events		The second management		
\$600 000 000 000 000 000 000 000 000 000	200.200.200.200.200.200.200.200.200.400.000.0			
Number of Vi	olation Events 2	74	Number of violation days	
	Indiana y sy			
	daily monthly			
mark only one	quarterly x		Violation Base Penalty	\$200
with an x	semiannual	***************************************	Troiding Date : emany	
	annual			
	single event			
-	**************************************			-
Two quarte		ank) are recommended from the June 11, 2007 screening	the March 29, 2007 investigation date.	
Economic Benefit (EB) for th	nis violation		Statutory Limit Test	
# Class Control of the Control of th	ed EB Amount	\$305	Violation Final Penalty Total	\$210
Louinate	Fillouit		-	
u.u-yaarin nee sooonise soooni tiite h.l.o.i., jaarinna ure paytunka-assosiisto oroniistooro		This violation Final Asse	essed Penalty (adjusted for limits)	\$210
	(GHPGHAII) DEN EN WOND GUIDE	ARREST SERVICES STATEMENT OF THE SERVICE STATE		

	iil vy a mar ⊟	conomic l	Benefit W	orks	sheet Same	lamatest galinde	noi!
Respondent	City of Paducal	h	537/67 L 1. U 152/6956		The second of the second	in a consequence of the control of t	
Case ID No.						S. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1.	
Reg. Ent. Reference No.							
그는 이 경기 목가 되었다. 그는 그 얼마나를 하는 것이 뭐 없었다.	Public Water S	unnly			and the state of the state of		Years of
Violation No.		арріу			8 - 8 - 8	Percent Interest	Depreciation
Violation No.			Barrier Barrier 🖟		- antenaçii		. V. 4**
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description	No commas or \$	MARKET AND THE STATE OF THE STA		431,58		. Programme	
The state of the s	and the same of th						
Delayed Costs							
Equipment		W 10 1 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	. 17.19 (J. 12.19)	0.0	\$0	\$0	\$0
Buildings		daman, mengelah		0.0	\$0	\$0	\$0
Other (as needed)			Table depiction in the	0.0 €	6 6 3 4 \$ 0 1 1 1 1	\$0	\$0
Engineering/construction			Lat rilica i tanto	- 0.0	\$2. V. 1.\$0	\$0	\$0
Land		er colored as as well	فالالمسطلقين عبد	0.0	\$0	n/a	\$0
Record Keeping System		ra e de de la constante		0.0	\$0	illused n/a	\$0
Training/Sampling		The second second		0.0	\$0	n/a	\$0
Remediation/Disposal				0,0	\$0	n/a	\$0
Permit Costs			t malle ille	0.0	\$0	n/a	\$0
Other (as needed)	\$6,000	29-Mar-2007	3-Apr-2008	1.0	\$305	n/a	\$305
Notes for DELAYED costs Avoided Costs		of the inve	stigation. Final da	ite is the	estimated date of	one-time avoided o	osts)
Disposal				0.0	\$0	\$0	\$0
Personnel				0,0	\$0	\$0	\$0
Inspection/Reporting/Sampling				0,0	. \$0	\$0	\$0
Supplies/equipment	barra barra			0,0	\$0	\$0	\$0
Financial Assurance [2]				0,0	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.0	\$0	\$0	\$0
Other (as needed)	لسيد فراكسته بدنا			0,0	\$0.	\$0	\$0
		There			coclated with this v		Tethe Well Tethers
Notes for AVOIDED costs	Burgaran da sana		. aan la sepa en le e . La la sepa en la				

Compliance History

Customer/Respondent/Owner-Operator: CN600629836 City of Paducah Classification: AVERAGE Rating: 2.88 Regulated Entity: RN101385029 CITY OF PADUCAH Classification: Site Rating: ID Number(s): PUBLIC WATER SYSTEM/SUPPLY REGISTRATION 0510001 WATER LICENSING **LICENSE** 0510001 804 WEST ST, COTTLE COUNTY, TX, 79248 Location: **REGION 03 - ABILENE** TCEQ Region: Date Compliance History Prepared: June 06, 2007 Agency Decision Requiring Compliance History: Enforcement Compliance Period: June 06, 2002 to June 06, 2007 TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History Name: Amy Martin Phone: 512-239-2540 **Site Compliance History Components** 1. Has the site been in existence and/or operation for the full five year compliance period? Yes 2. Has there been a (known) change in ownership of the site during the compliance period? No 3. If Yes, who is the current owner? N/A 4. if Yes, who was/were the prior owner(s)? N/A 5. When did the change(s) in ownership occur? N/A Components (Multimedia) for the Site: Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government. N/A В. Any criminal convictions of the state of Texas and the federal government. C. Chronic excessive emissions events. The approval dates of investigations. (CCEDS Inv. Track. No.) D. 1 03/10/2004 (265428)2 06/19/2006 (483363)3 05/31/2007 (556782)Written notices of violations (NOV). (CCEDS Inv. Track. No.) E. Date: 03/10/2004 (265428)Self Report? NO Classification: Minor 30 TAC Chapter 290, SubChapter F 290.121(a) Citation: FAILURE TO COMPLETE SYSTEM MONITORING PLAN. Description: Self Report? NO Classification: Minor Citation: 30 TAC Chapter 290, SubChapter D 290.46(j) FAILURE TO PROVIDE CERTIFIED CUSTOMER SERVICE INSPECTOR. Description: Self Report? NO Classification: Minor Citation: 30 TAC Chapter 290, SubChapter D 290.44(h)(4)(A)(i) FAILURE TO CONDUCT BACKFLOW DEVICE INSTALLATION AND TESTING Description: ACTIVITIES. NO Self Report? Classification: Minor 30 TAC Chapter 290, SubChapter D 290.41(c)(3)(N) Citation: FAILURE TO PROVIDE METERING DEVICES ON WATER WELLS. Description: Self Report? NO Classification: Minor Citation: 30 TAC Chapter 290, SubChapter D 290.41(c)(3)(Q)

FAILURE TO PROVIDE SCREENED AIR RELEASE DEVICES ON WELLS.

FAILURE TO PREVENT CATTLE FROM GRAZING WITHIN 50' OF WATER WELL.

30 TAC Chapter 290, SubChapter D 290.41(c)(1)(D)

Classification:

Description: Self Report?

Citation: Description: NO

Classification: Minor

Citation:

30 TAC Chapter 290, SubChapter D 290.41(c)(1)(F)

Description:

FAILURE TO PROVIDE SANITARY CONTROL EASEMENTS FOR WELLS.

Self Report?

NO

Classification

Minor

Citation:

30 TAC Chapter 290, SubChapter D 290,46(t)

Description:

FAILURE TO PROVIDE EMERGENCY SIGNS AT WATER PRODUCTION AND

STORAGE SITES.

Self Report? NO Classification

Minor

Citation:

30 TAC Chapter 290, SubChapter D 290.43(c)(8)

Description:

FAILURE TO MAINTAIN PAINTED SURFACES ON WATER STORAGE

FACILITIES.

Self Report? NO Classification

Minor

Citation:

30 TAC Chapter 290, SubChapter D 290.43(c)(3)

Description: Self Report? NO

FAILURE TO MAINTAIN OVERFLOW DEVICES ON WATER STORAGE TANKS.

Classification

Minor

Citation:

Description:

30 TAC Chapter 290, SubChapter D 290.43(c)(2)

FAILURE TO PROVIDE 30" ACCESS OPENING ON WATER STORAGE

Self Report? NO

Minor

Citation:

30 TAC Chapter 290, SubChapter D 290,43(c)(6)

Description:

FAILURE TO MAINTAIN WATER STORAGE FACILITIES IN WATER TIGHT

CONDITION.

Self Report?

NO

Classification

Minor

Citation: Description: 30 TAC Chapter 290, SubChapter D 290.43(e) FAILURE TO MAINTAIN INTRUDER RESISTANT FENCING.

F. Environmental audits.

N/A

G. Type of environmental management systems (EMSs).

Η. Voluntary on-site compliance assessment dates.

1. Participation in a voluntary pollution reduction program.

N/A

Early compliance.

N/A

Sites Outside of Texas

N/A

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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



IN THE MATTER OF AN	§	BEFORE THE
ENFORCEMENT ACTION	§	
CONCERNING	§	TEXAS COMMISSION ON
CITY OF PADUCAH	§	
RN101385029	§	ENVIRONMENTAL QUALITY

AGREED ORDER DOCKET NO. 2007-0927-PWS-E

I. JURISDICTION AND STIPULATIONS

At its ______ agenda, the Texas Commission on Environmental Quality ("the Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding City of Paducah ("the City") under the authority of Tex. Health & Safety Code ch. 341. The Executive Director of the TCEQ, through the Enforcement Division, and the City appear before the Commission and together stipulate that:

- 1. The City owns and operates a public water supply at 804 West Street, Cottle County, Texas (the "Facility") that has approximately 750 service connections and serves at least 25 people per day for at least 60 days per year.
- 2. The Commission and the City agree that the Commission has jurisdiction to enter this Agreed Order, and that the City is subject to the Commission's jurisdiction.
- 3. The City received notice of the violations alleged in Section II ("Allegations") on or about June 3, 2007.
- 4. The occurrence of any violation is in dispute and the entry of this Agreed Order shall not constitute an admission by the City of any violation alleged in Section II ("Allegations"), nor of any statute or rule.
- 5. An administrative penalty in the amount of Three Thousand Ninety-Seven Dollars (\$3,097) is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). The City has paid Two Thousand Four Hundred Seventy-Eight Dollars (\$2,478) of the administrative penalty and Six Hundred Nineteen Dollars (\$619) is deferred contingent upon the City's timely and satisfactory compliance with all the terms of this Agreed Order. The deferred

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amount will be waived upon full compliance with the terms of this Agreed Order. If the City fails to timely and satisfactorily comply with all requirements of this Agreed Order, the Executive Director may require the City to pay all or part of the deferred penalty.

- 6. Any notice and procedures, which might otherwise be authorized or required in this action, are waived in the interest of a more timely resolution of the matter.
- 7. The Executive Director of the TCEQ and the City have agreed on a settlement of the matters alleged in this enforcement action, subject to the approval of the Commission.
- 8. The Executive Director may, without further notice or hearing, refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings if the Executive Director determines that the City has not complied with one or more of the terms or conditions in this Agreed Order.
- 9. This Agreed Order shall terminate five years from its effective date or upon compliance with all the terms and conditions set forth in this Agreed Order, whichever is later.
- 10. The provisions of this Agreed Order are deemed severable and, if a court of competent jurisdiction or other appropriate authority deems any provision of this Agreed Order unenforceable, the remaining provisions shall be valid and enforceable.

II. ALLEGATIONS

As owner and operator of the Facility, the City is alleged to have:

- 1. Failed to submit well completion data prior to placing the well into service, in violation of 30 Tex. ADMIN. CODE § 290.41(c)(3)(A), as documented during an investigation conducted on March 29, 2007.
- 2. Failed to perform customer service inspections prior to providing continuous water service to new construction, in violation of 30 Tex. ADMIN. CODE § 290.46(j), as documented during an investigation conducted on March 29, 2007.
- 3. Failed to install a backflow prevention assembly within the distribution system where a known health hazard exists, in violation of 30 Tex. ADMIN. CODE § 290.44(h)(4), as documented during an investigation conducted on March 29, 2007.
- 4. Failed to provide flow meters on the well discharge lines, in violation of 30 TEX. ADMIN. CODE § 290.41(c)(3)(N), as documented during an investigation conducted on March 29, 2007.
- 5. Failed to compile a thorough plant operations manual and keep it up-to-date for operator review and reference, in violation of 30 Tex. ADMIN. CODE § 290.42(I), as documented during an investigation conducted on March 29, 2007.

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6. Failed to maintain, design, fabricate, erect, test and disinfect all facilities for potable water storage in strict accordance with American Water Works Association ("AWWA") standards, in violation of 30 Tex. ADMIN. Code § 290.43(c)(2), (3), (6) and (8), as documented during an investigation conducted on March 29, 2007.

III. DENIALS

The City generally denies each allegation in Section II ("Allegations").

IV. ORDERING PROVISIONS

1. It is, therefore, ordered by the TCEQ that the City pay an administrative penalty as set forth in Section I, Paragraph 5 above. The payment of this administrative penalty and the City's compliance with all the terms and conditions set forth in this Agreed Order resolve only the allegations in Section II. The Commission shall not be constrained in any manner from requiring corrective action or penalties for violations, which are not raised here. Administrative penalty payments shall be made payable to "TCEQ" and shall be sent with the notation "Re: City of Paducah, Docket No. 2007-0927-PWS-E" to:

Financial Administration Division, Revenues Section Attention: Cashier's Office, MC 214 Texas Commission on Environmental Quality P.O. Box 13088 Austin, Texas 78711-3088

- 2. It is further ordered that the City shall undertake the following technical requirements:
 - a. Within 30 days after the effective date of this Agreed Order:
 - i. Compile and begin maintaining an up-to-date and thorough plant operations manual for operator review and reference, in accordance with 30 Tex. ADMIN. CODE § 290.42;
 - ii. Install backflow prevention devices at areas where a known health hazard exists, in accordance with 30 TEX. ADMIN. CODE § 290.44;
 - iii. Provide a flow meter on the well discharge lines, in accordance with 30 TEX. ADMIN. CODE § 290.41; and
 - iv. Acquire and submit the well completion data, in accordance with 30 TEX. ADMIN. CODE § 290.41.
 - b. With 60 days after the effective date of this Agreed Order:
 - i. Submit documentation as described in Ordering Provision 2.c. that demonstrates compliance with Ordering Provision 2.a.;

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- ii. Implement a customer service inspection program that will ensure that customer service inspections are performed by a certified individual, in accordance with 30 Tex. Admin. Code § 290.46; and
- iii. Ensure the ground storage tanks are maintained and designed in strict accordance with current AWWA standards, in accordance with 30 Tex. ADMIN. CODE § 290.43.
- c. Within 75 days after the effective date of this Agreed Order, submit written certification as described below, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision No. 2.b. The certification shall be notarized by a State of Texas Notary Public and include the following certification language:

"I certify under penalty of law that I have personally examined and am familiar with the information submitted and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

The certification shall be submitted to:

Order Compliance Team
Enforcement Division, MC 169
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

with a copy to:

Manager, Water Section Abilene Regional Office Texas Commission on Environmental Quality 1977 Industrial Boulevard Abilene, Texas 79602-7833

- 3. The provisions of this Agreed Order shall apply to and be binding upon the City. The City is ordered to give notice of the Agreed Order to personnel who maintain day-to-day control over the Facility operations referenced in this Agreed Order.
- 4. The Executive Director may grant an extension of any deadline in this Agreed Order or in any plan, report, or other document submitted pursuant to this Agreed Order, upon a written and substantiated showing of good cause. All requests for extensions by the City shall be made in writing to the Executive Director. Extensions are not effective until the City receives written

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City of Paducah DOCKET NO. 2007-0927-PWS-E Page 5

approval from the Executive Director. The determination of what constitutes good cause rests solely with the Executive Director.

- 5. This Agreed Order, issued by the Commission, shall not be admissible against the City in a civil proceeding, unless the proceeding is brought by the OAG to: (1) enforce the terms of this Agreed Order; or (2) pursue violations of a statute within the Commission's jurisdiction, or of a rule adopted or an order or permit issued by the Commission under such a statute.
- 6. This agreement may be executed in multiple counterparts, which together shall constitute a single original instrument. Any executed signature page to this Agreement may be transmitted by facsimile transmission to the other parties, which shall constitute an original signature for all purposes.
- 7. Under 30 TEX. ADMIN. CODE § 70.10(b), the effective date is the date of hand-delivery of the Order to the City, or three days after the date on which the Commission mails notice of the Order to the City, whichever is earlier. The Chief Clerk shall provide a copy of this Agreed Order to each of the parties.

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SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission	
For the Executive Director	Date 121/2008
attached Agreed Order on behalf of the entity indic	tached Agreed Order. I am authorized to agree to the cated below my signature, and I do agree to the terms wledge that the TCEQ, in accepting payment for the centation.
 timely pay the penalty amount, may result in: A negative impact on compliance history; Greater scrutiny of any permit applications of the Referral of this case to the Attorney Generates, and/or attorney fees, or to a collection. Increased penalties in any future enforcement 	ral's Office for contempt, injunctive relief, additional etion agency; nt actions; s Office of any future enforcement actions; and law.
Macward Smilk	August 14, 2007 Date
Howard Smith Name (Printed or typed) Authorized Representative of City of Paducah	Mayor

Instructions: Send the original, signed Agreed Order with penalty payment to the Financial Administration Division, Revenues Section at the address in Section IV, Paragraph 1 of this Agreed Order.

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